

John Coletta
Assistant Vice President
Legal Affairs

June 21, 2007

## **VIA FACSIMILE**

Hon. Naomi R. Buchwald United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Room 1320 New York, NY 10007

Re: <u>BMI, et al. v. Ask 244, LLC d/b/a The Plumm, et al.</u> 1:07-CV-02967

Dear Judge Buchwald:

At the request of counsel for Defendant Ask 244, LLC, Plaintiff BMI is submitting the following Stipulation For Extension of Time to Answer which proposes July 3, 2007 as the new deadline for Defendants to file their answer(s) to the complaint, for Your Honor's consideration.

Respectfully submitted,

hn Coletta

cc: Eunyoung Choi Bruno Codispoti, Esq. (counsel for Ask 244, LLC)



John Coletta (JC 7522) Judith M. Saffer (JS 3161) Attorneys for Broadcast Music, Inc. 320 West 57<sup>th</sup> Street New York, New York 10019 (212) 830-2590

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

BROADCAST MUSIC, INC.; et al.,

Plaintiffs,

V

ASK 244, LLC d/b/a THE PLUMM and EUGENE BOISSIERE, THOMAS FRAYNE, NOEL ASHMAN, JASON KRYSTAL, STEPHANIE RUHLE HUBBARD, And KRISTEN DICKEY, each individually,

Defendants.

CIVIL ACTION NO .:

1:07-cv-2967

Judge Buchwald

## STIPULATION FOR EXTENSION OF TIME TO ANSWER

Plaintiffs, having initiated this action against Defendants on April 13, 2007, and having served Defendants with the summons and complaint on or around April 19, 2007; and Defendants, having contacted Plaintiffs prior to the May 9, 2007 deadline for filing their answer(s) to the complaint to request an extension of time with respect thereto; and Plaintiffs, having agreed to grant such extension so that the parties may continue to pursue the possibility of settling this matter without any further litigation; Plaintiff BMI, for itself and its co-Plaintiffs through their undersigned counsel, and Defendant Ask 244, LLC, for

itself and its co-Defendants through its undersigned counsel, hereby stipulate and move this Court to set July 3, 2007 as the deadline for Defendants to file their answer(s) to the complaint.

By:

BROADCAST MUSIC, INC., for itself and its co-Plaintiffs,

Dated: JUNE 20 , 2007

John Coletta (JC 7522) Broadcast Music, Inc. 320 West 57th Street New York, NY 10019

Attorney for Plaintiff BMI

Dated: JW6 20 , 2007

ASK 244, LLC d/b/a The Plumm, for itself and

its co-Defendants,

By:

Bruno Codispoti, Esq. (BC 4568) Codispoti & Mancinelli, LLP 111 John Street, Ste. 800 New York, NY 10038

Attorney for Defendant ASK 244, LLC

So Ordered: